

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SECURA INSURANCE COMPANY,)	
)	
Plaintiff,)	
)	Case No. 1:24-cv-00862
v.)	
)	
WENDY’S INTERNATIONAL, LLC,)	
WENDY’S PROPERTIES, LLC,)	
)	
Defendant)	
)	
JIM E. DUBBERKE, JR.,)	
)	
Necessary Party.)	

**SECURA INSURANCE COMPANY’S MOTION FOR SUMMARY JUDGMENT ON ITS
AMENDED COMPLAINT FOR DECLARATORY JUDGMENT**

Plaintiff, SECURA Insurance Company (“SECURA”) pursuant to Federal Rule of Civil Procedure 56 and Local Rule 56.1 respectfully requests that this Court grant summary judgment in its favor on its Amended Complaint for Declaratory Judgment. In support of this motion, SECURA submits its Memorandum in Support of SECURA’s Motion for Summary Judgment on its Amended Complaint for Declaratory Judgment and its Local Rule 56.1 Statement of Material Facts with exhibits, which are incorporated by reference herein.

Respectfully submitted,

STONE & JOHNSON, CHTD.

/s Andrea M. Ross
Attorney for SECURA
Insurance Company

Andrea M. Ross (ARDC No. 6288559)
STONE & JOHNSON, CHTD.
111 W. Washington St., Suite 1800
Chicago, Illinois 60602
(312) 332-5656
aross@stonejohnsonlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on March 6, 2025, I electronically filed the foregoing Motion for Summary Judgment with the Clerk of the Court using the CM/ECF system, which sends electronic notification to all registered participants of such filings to all attorneys of record.

/s/ Andrea M. Ross
Andrea M. Ross